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October 22, 2009

By Email and Hand Delivery

Marchant Schneider, Project Manager
Loudoun County Department of Planning
1 Harrison Street, S.E., 3rd Floor
Leesburg, VA 20177-7000



Re: SPEX 2009-0006, Dulles Industrial Park South Lot 1

Dear Mr. Schneider:

The following are the Applicant's *supplemental* responses to the referral agency comments received in connection with the above-referenced Special Exception Application, which supplement the responses contained in the Applicant's letter dated October 9, 2009. The comments are on the pages indicated below:

<u>Referral Agency</u>	<u>Page</u>
1. Department of Building and Development Memorandum dated May 19, 2009	2

**Department of Building and Development
Memorandum dated May 19, 2009
from Todd Taylor, Environmental Review Team**

The Environmental Review Team (ERT) reviewed the subject application during the May 11, 2009, ERT Meeting. Our comments pertaining to the current application are as follows:

COMMENT 1. Issues related to the Revised 1993 Loudoun County Zoning Ordinance (Revised 1993 LCZO):

Section 6-1310(B) of the Revised 1993 LCZO identifies “safety from fire hazards and effective measures of fire control” as an issue for consideration for a special exception application. Please provide information describing the measures that will be utilized at the project site to ensure public and environmental safety. For example, what are the training requirements for all technicians handling the propane tanks? Also, the statement of justification references the use of a propane odorant for detection and a remote emergency shut-off station between 100 and 255 feet from the tanks. Please explain the specified setback distances and describe how the shut-off station functions. Staff defers to the Department of Fire and Rescue regarding fire safety at the proposed site. However, staff recommends that an emergency action plan be developed in case of a propane leak, explosion, or other emergency situation.

RESPONSE: Public water was recently extended to the portions of Wade Drive adjacent to the Applicant’s parcel, and the County has installed two fire hydrants adjacent to Applicant’s parcel, which are reflected on the revised plan, submitted herewith. In addition, the proposed AmeriGas tanks will contain upgraded pneumatic actuator valves that automatically shut off the flow of gas if any leak is detected and will immediately notify AmeriGas of the leak. Furthermore, all AmeriGas employees and drivers receive mandatory safety training, and the tanks will be surrounded by appropriate safety signage, including emergency procedures.

The Applicant’s parcel is located in a heavily industrial area with no residential properties in proximity. In fact, given that the property is located within the Ldn contour of the Airport Impact Overlay District, no residential uses could ever be developed on or near the Applicant’s property. In addition, the proposed propane tanks are constructed with 1¼” thick steel walls with a pressure release valve 12’ above the top of the tanks. Given the tanks’ design, in the extremely unlikely event that the propane—which is stored at negative 40°—were to rise in temperature to the point of ignition, the flames would be released through the pressure release valve like a smoke-stack, and could never result in any sort of explosion or spread to adjacent parcels. Finally, Applicant will submit an emergency response and evacuation plan to local Fire-Rescue personnel, work with them on that plan, and invite them to the site (once completed) for safety training and preparedness planning. The Applicant notes that AmeriGas is more than willing to

work with Fire-Rescue personnel on their emergency response and evacuation plan and also to welcome local first responders to the site for emergency planning.

COMMENT 2. Issues related to the Revised 1993 LCZO and Revised General Plan (RGP):

The project site is located in the Bull Run watershed and drains to the Occuquan Reservoir, a drinking water supply. Currently, there does not appear to be a stormwater management (SWM)/best management practice (BMP) facility that stores and treats runoff from the site prior to discharging to the major floodplain. According to the statement of justification, the proposed facility includes the installation of a concrete slab, which will increase stormwater runoff. In addition, the regular truck activity to and from the facility has the potential to release hydrocarbons at the site. As such, staff supports providing on-site water quality treatment to help protect the watershed. [Revised 1993 LCZO Section 6-1310(H) and RGP Surface Water Policy 5]

RESPONSE: The Applicant acknowledges Staff's comments. The Applicant has responded to Staff's concerns about stormwater runoff by correcting the actual size of the proposed concrete pads, removing some of the gravel areas around the propane tanks and replacing them with green grass, as indicated on the revised plat, submitted herewith. These changes should reduce the amount of impervious area thereby actually decreasing stormwater runoff leaving the site from current levels. Stormwater management and/or best management practices for new development shall be in accordance with the current Facilities Standards Manual (see note 7 on plat sheet 2).